

CLD&SW: USAO2018R00062

U.S. DISTRICT COURT
DISTRICT OF MARYLAND

IN THE UNITED STATES DISTRICT COURT 2018 FEB -6 PM 5:29
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

DONALD MARCELL RIVERS JR.,
TIMOTHY MICHAEL MCLAIN, and
ASHLEY NICOLE COLLIER,

Defendants.

* CRIMINAL NO. *DKC-18-066*
* BY *DEPUTY*
* (Conspiracy and Interference with
* Commerce by Robbery, 18 U.S.C.
* § 1951(a); Aiding & Abetting, 18 U.S.C.
* § 2)

INDICTMENT

COUNT ONE
(Conspiracy and Interference with Commerce by Robbery)

The Grand Jury for the District of Maryland charges that:

1. At all times material to this Indictment, the BB&T Bank, located at 1326 Salem Avenue, Hagerstown, Maryland, was engaged in providing banking services to business and individual consumers in interstate commerce and the business of the BB&T Bank affected interstate commerce.

2. Beginning at least on January 9, 2018, in the District of Maryland, the defendants,

**DONALD MARCELL RIVERS JR.,
TIMOTHY MICHAEL MCLAIN, and
ASHLEY NICOLE COLLIER,**

did knowingly, obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, and did knowingly conspire with one another to do same, in that the defendants did

conspire to and did unlawfully take and obtain money and property belonging to the BB&T Bank from the person of and in the presence of employees of the BB&T Bank, against the employees' will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employees' person and property in the employees' custody and possession.

18 U.S.C. § 1951(a)

18 U.S.C. § 2

*Stephen M. Schenning /cld
Christine Dug*
Stephen M. Schenning
Acting United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

FOREPERSON

2-6-18
Date